

1 Magistrate Judge Brian A. Tsuchida
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OCT 30 2024

6 AT SEATTLE
7 CLERK U.S. DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 BY DEPUTY
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12 UNITED STATES DISTRICT COURT FOR THE
13 WESTERN DISTRICT OF WASHINGTON
14 AT SEATTLE
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17 UNITED STATES OF AMERICA,

CASE NO. MJ24-694

18 Plaintiff

COMPLAINT for VIOLATION

19 v.

18 U.S.C. Section 922(g)(1)

20 ANTENEH TESFAYE,

Defendants.

21 BEFORE BRIAN A. TSUCHIDA, United States Magistrate Judge, U. S.
22 Courthouse, Seattle, Washington.

23 The undersigned complainant being duly sworn states:

24 COUNT 1

25 (Unlawful Possession of a Firearm)

26 On or about October 30, 2024, in Snohomish County, within the Western District
27 of Washington, Anteneh TESFAYE aka "Anteneh Tedasse" (hereafter, TESFAYE),
knowing he had been convicted of the following crimes punishable by a term of
imprisonment exceeding one year:

- 1 i. *Robbery in the First Degree*, in Superior Court of Washington for
2 King County, under case number 05-C-06766-3 KNT, on or about
3 January 20, 2006; and
4 i. *Residential Burglary*, in Superior Court of Washington for King
5 County, under case number 05-1-07590-9 KNT, on or about
6 October 31, 2008;

7 did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that
8 is: a FNH model 509, that had been shipped and transported in interstate and foreign
9 commerce.

10 All in violation of Title 18, United States Code, Section 922(g)(1).

11 And the complainant states that this Complaint is based on the following information:

12 I, Jonas Restad, being first duly sworn on oath, depose and say:

13 **AFFIANT BACKGROUND AND QUALIFICATIONS**

14 1. I am a “law enforcement officer of the United States” within the meaning of
15 Title 18, United States Code, Section 2510(7). Specifically, I am a Special Agent (SA)
16 with Homeland Security Investigations (“HSI”) within the United States Department of
17 Homeland Security (DHS). As a Special Agent, I investigate violations of the Controlled
18 Substance Act, Title 21, United States Code, Section 801, et seq., and other violations of
19 federal law, to include violations of Title 18, United States Code, Section 922. I have
20 been a Special Agent with HSI since April 2021. I was trained to conduct investigations
21 relating to violations of federal law including the manufacturing and trafficking of
22 controlled substances and money laundering through the Criminal Investigator Training
23 Program and the Homeland Security Investigations Special Agent Training Program at
24 the Federal Law Enforcement Training Center in Glynco, Georgia. My training and
25 experience in narcotics enforcement has included the identification of narcotics,
26 including fentanyl, cocaine, methamphetamine, heroin, opium, MDMA, and marijuana,

1 and the investigation of persons in possession of narcotics for purposes of sales and
2 transportation, as well as persons conspiring to transport and sell narcotics.

3 2. As a federal law enforcement officer, I have received formal training, as
4 well as on-the-job training, in the investigation of narcotics trafficking. I have
5 participated in investigations involving controlled substances, money laundering, and
6 other criminal activity. I am familiar with how drug traffickers use, sell, conceal, and
7 transport, controlled substances. I have been involved in drafting and executing a number
8 of search warrants, conducting controlled narcotics buy operations, and arresting those
9 involved in controlled substances trafficking. I also speak regularly with narcotics
10 investigators at the federal, state, and local level, sellers of narcotics, and informants
11 regarding the manner in which sellers of narcotics store, sell, transport, and communicate
12 about narcotics.

13 3. I am also familiar with the methods employed by narcotics traffickers to
14 conceal their trafficking activity and the origin of proceeds generated by this activity. I
15 am aware that traffickers use slang and coded words, multiple cell phones, concealed
16 compartments, “stash” houses to conceal their activities, and launder or otherwise
17 conceal cash proceeds by hiding and transporting bulk cash, sending funds through wire
18 transfers or bank accounts in other persons’ names, and/or investing in assets placed in
19 other persons’ names.

20 4. I know that persons who illegally possess and distribute controlled
21 substances often possess firearms and ammunition to protect themselves, their drugs, and
22 their drug proceeds from others. Drug dealing is often a cash business, and dealers often
23 maintain firearms and ammunition to protect their drugs and cash. I also know that drug
24 dealers will often need and use firearms to help them intimidate potential rivals and to aid
25 in the collection of drug debts. Therefore, I know that firearms and ammunition, knives
26 and other weapons are often found at the location of narcotic search warrants, referred to
27 in communications, and on persons involved in drug dealing and trafficking.

1 5. I know from my training and experience drug dealers often use their
2 vehicles to conduct and facilitate their drug distribution activities. Drug dealers
3 commonly store drugs and drug proceeds at their residences or stash houses and then
4 transport them to/away from their residences or the stash houses in their vehicles. Drug
5 dealers also commonly use their vehicles to transport drugs and drug proceeds between
6 stash houses and their customers. Additionally, drug dealers sometimes store drugs and
7 drug proceeds in their vehicles so that law enforcement officers searching their residences
8 do not discover them.

9 6. This application is based on information I have gained from my own
10 investigation, personal observations, training, and experience, as well as information
11 related to me by other detectives, police officers, and/or federal agents through oral and
12 written reports. In addition, I have reviewed and am familiar with the investigative file in
13 this matter.

INVESTIGATION AND PROBABLE CAUSE

Background of Investigation

16 7. This investigation arose from a drug trafficking investigation conducted out
17 of the Western District of Pennsylvania (WDPA). As a result of that earlier investigation,
18 29 defendants were charged on December 20, 2022, in the WDPA for violation of Title
19 21, United States Code, Section 846, Conspiracy to Distribute Controlled Substances
20 (including cocaine, fentanyl, and methamphetamine), and other federal offenses. See
21 WDPA Case No. CR22-021. The WDPA conspiracy spanned several states, including
22 Pennsylvania, Arizona, and Washington.

23 8. In late February 2023, based on evidence gathered in the WDPA
24 investigation and related searches in this District, seven additional defendants were
25 charged in this District with Conspiracy to Distribute Controlled Substances and/or
26 Possession with Intent to Distribute Controlled Substances (WDWA Case No. CR23-
27 025-TL). These additional defendants were arrested in early March 2023.

1 9. Since then, agents have continued to investigate additional members of the
2 DTO operating here in this District, to include Amir OSMAN, Muhamed CEESAY, Ali
3 KUYATEH, and Lamin SAHO.

4 10. On May 8, 2024, in WDMA Cause No. GJ24-321, the Honorable U.S.
5 District Court Judge John H. Chun authorized the interception of electronic
6 communications over Amir OSMAN's Snapchat account with username "twoprezz"
7 (Target Account 14, or "TA14"). Investigators began intercepting electronic
8 communications occurring over this account beginning that same day, on May 8, 2024.
9 Pursuant to the terms of the order, interception over TA14 ended on June 6, 2024.

10 11. On June 26, 2024, in WDMA Cause No. GJ24-425, the Honorable U.S.
11 District Court Judge John H. Chun signed an order authorizing the interception of wire
12 and electronic communications over Muhamed CEESAY's telephone (206) 751-9426
13 (TT30). Investigators began intercepting wire and electronic communications occurring
14 over this account beginning that same day, on June 26, 2024. Pursuant to the terms of the
15 order, interception over TT30 ended on July 25, 2024.

16 12. During interception of TT30, investigators identified the user of phone
17 number (206) 683-2980 to be an individual who appears to occupy a leadership role in
18 this drug trafficking organization (DTO), as well as in several other DTOs. Investigators
19 initially identified this individual as "unidentified male x2980" or "UM2980" and by his
20 nickname, "Pops." As discussed below, investigators have since positively identified
21 UM2980/Pops to be Ali KUYATEH.

22 13. On August 12, 2024, in WDMA Cause No. GJ24-524, the Honorable U.S.
23 District Court John H. Chun authorized the interception of wire and electronic
24 communications over KUYATEH's telephone (206) 683-2980 (TT35), SAHO's
25 telephone (929) 371-1019 (TT37), and CEESAY's telephone (206) 255-0855 (TT45).
26 Investigators began intercepting wire and electronic communications occurring over
27

1 these telephones beginning that same day, on August 12, 2024. Pursuant to the terms of
 2 the order, interception over TT35, TT37, and TT45 ended on September 10, 2024.

3 *TESFAYE is Intercepted Arranging Drug Transactions*

4 14. During interception over KUYATEH's phone (TT35), on August 27, 2024
 5 at 5:46 p.m., TESFAYE (206) 557-8332 called KUYATEH (Session 6217). In that call,
 6 TESFAYE told KUYATEH (TT35), "I need to re-up and then... I got money for you, too,
 7 now." TESFAYE then specified what narcotics he wanted: "I need the Supermans you
 8 had... I need the – if you could get uh... probably the twenties." The term "superman" is
 9 commonly used to refer to multiple different types of narcotics, including cocaine and LSD.
 10 In this context however, it appears TESFAYE is referring to pills as he referenced
 11 milligrams. Investigators believe these pills were likely MDMA, as they know from
 12 training and experience that there is a specific type of ecstasy called "Superman." The pills
 13 are commonly embossed with the Superman logo. KUYATEH responded "Okay just give
 14 me a call and I'll come – come meet up with you." At 10:14 p.m., TESFAYE called
 15 KUYATEH (TT35), who stated, "I'll be around in about thirty" (Session 6356). TESFAYE
 16 asked "where you going, Pop? The house?" KUYATEH affirmed. In the above calls,
 17 investigators believe that TESFAYE was attempting to source narcotics from KUYATEH,
 18 as well as repay KUYATEH for narcotics he had sourced previously. KUYATEH and
 19 TESFAYE appeared to plan to conduct this transaction at "the house," which as discussed
 20 above is one of the drug-involved premises run by KUYATEH.

21 15. In another call on September 6, 2024, at 10:36 p.m., TESFAYE called
 22 KUYATEH and asked for cocaine (Session 9479). During the call, TESFAYE stated "okay
 23 you know what, I'll just wait... uh next week, remember I was supposed to grab the white
 24 girl?" Investigators know based on training and experience that "white girl" is common
 25 drug slang for cocaine. In this call, therefore, it appears TESFAYE stated that he needed
 26 to pick up cocaine from KUYATEH but that he would wait and do it next week.

27

1 TESFAYE's Snapchat Communications

2 16. On June 27, 2024, investigators reviewed public Snapchat posts from
3 TESFAYE's Snapchat account with username "kinganteneh" that reflected he possessed
4 firearms in conjunction with his drug trafficking.¹ A video posted to the account on June
5 27, 2024 at 1:30 p.m. depicted a handgun sitting on a table, along with a spread-out stack
6 of \$100 dollar bills, which appears to total thousands of dollars. The video was captioned
7 "Got that FN... 4 you fuccc.N****s," as depicted below:



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23 ¹ Records obtained from T-Mobile reflect that (206) 557-8332 has been subscribed to Anteneh TESFAYE at the
24 address 9114 236th St SW, Apt 4, Edmonds, WA since November 15, 2017. Investigators have also determined that
25 x8332 is associated with a Snapchat account with the username "kinganteneh." The apparent user of this account,
26 depicted in public posts, resembles TESFAYE's Washington driver's license photo. Investigators also note that the
username for the account, "kinganteneh," includes TESFAYE's first name "Anteneh." Additionally, investigators
queried the number assigned to x8332 in a law enforcement database, which returned a report from Seattle Police
Department dated June 02, 2024 (report number 2024-149211) that reflects this number is associated with
TESFAYE.

1 17. Based on investigators training and experience, including specifically with
 2 this DTO, videos such as these that depict firearms and currency are commonly posted to
 3 social media as a way to brag about the poster's success in drug trafficking.

4 18. In September 2024, after viewing the above video, a UC agent posing as a
 5 firearms buyer exchanged messages with TESFAYE through his Snapchat account.
 6 During the correspondence, TESFAYE stated "Got FNS09, but I ain't letting that for
 7 below 1500\$." In this way, TESFAYE confirmed he is in possession of an FNS-9 (a
 8 9mm pistol).

9 *Search of TESFAYE's Residence*

10 19. In WDMA Cause No. MJ24-685, investigators obtained a warrant to search
 11 TESFAYE's residence, located at 9114 236th St SW, Apartment D4, Edmonds, WA
 12 98026, for evidence of drug trafficking and associated firearms offenses.

13 20. Investigators executed the warrant at TESFAYE's residence on October 30,
 14 2024. Following the search of TESFAYE's residence, I spoke to an investigator
 15 conducting a search of the residence who informed me of the following:

16 a. TESFAYE was the sole occupant of the residence at the time
 17 investigators searched the residence;

18 b. Investigators recovered a stolen, loaded FNH model 509 pistol from
 19 the attic of the residence.² A photo of the firearm, as it was found, is included below:

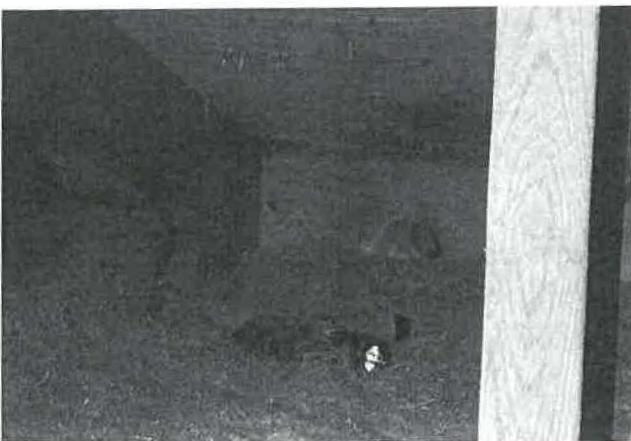
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24 26 ² Investigators queried the firearm through NCIC, which reflected that it was stolen. The firearm had a 9mm round
 25 in the chamber and a number of 9mm rounds in the magazine that was inserted into the firearm.



8 c. Investigators also found a number of documents in the residence,
9 including a Sound Credit Union document in the name "Anteneh Tesfaye" and an
10 Ethiopian passport in the name "Anteneh Tesfaye Tedasse;" and

11 d. Investigators spoke to the on-site property manager who stated that
12 *JRR lives in*
13 TESFAYE is sole occupant of Apartment D4.

14 21. An Alcohol Tobacco and Firearms (ATF) firearms interstate nexus expert
15 has examined the photograph in the previous paragraph and has communicated to me that
16 it depicts a real firearm (an FNH model 509 pistol), and that this firearm was not
17 manufactured in the State of Washington and had thus been transported in interstate or
foreign commerce prior to being possessed by TESFAYE.

18 22. Anteneh TESFAYE has at least the following felony convictions for which
19 he was sentenced to a term of imprisonment exceeding one year that prohibit him from
20 possessing firearms pursuant to 18 United States Code Section 922(g)(1):

- 21
- 22 ii. *Robbery in the First Degree*, in Superior Court of Washington for
23 King County, under case number 05-C-06766-3 KNT, on or about
January 20, 2006; and
- 24 ii. *Residential Burglary*, in Superior Court of Washington for King
25 County, under case number 05-1-07590-9 KNT, on or about
October 31, 2008.
- 26
- 27

CONCLUSION

2 Based on the above facts, I respectfully submit that there is probable cause to
3 believe that Anteneh TESFAYE did knowingly and intentionally unlawfully possess a
4 firearm, in violation of Title 18, United States Code, Section 922(g)(1).

Jonas Restad
Jonas Restad, Complainant
Special Agent, Homeland Security
Investigations

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the Defendant committed the offense set forth in the Complaint.

Dated this 30th day of October 2024.

BRIAN A. TSUCHIDA
United States Magistrate Judge